

**REMARKS**

**I. STATUS OF THE CLAIMS**

Claims 1-25 are pending in the present application. Claims 1, 17, and 22 are the independent claims.

Claims 2, 3 and 18 have been cancelled without prejudice to or disclaimer of the subject matter recited therein.

Claims 1, 17, 22 and 23 have been amended. No new matter is believed to have been added.

**II. THE REJECTION OF CLAIMS 1-8, 10-11, 17-20, and 22-23 UNDER 35 U.S.C. §102(b) AS BEING ANTICIPATED BY TADOKORO ET AL. (EP 1 022 931).**

Applicants respectfully traverse this rejection for at least the following reasons.

Independent claim 1 recites, inter alia, first electrodes formed on the substrate as a plurality of parallel evenly spaced lines, and first electrode terminals connected to the respective first electrodes; a second electrode unit comprising: second electrodes formed in an orthogonal direction with respect to the first electrodes over the first electrodes, and second electrode terminals connected to the respective second electrodes; an emission area formed where the first electrodes intersect the second electrodes; an electroluminescent layer disposed between the first electrodes and the second electrodes in the emission area; an inter insulating layer provided under the electroluminescent layer and covering a space between each of the plurality of lines of the first electrodes and a portion of a top surface of each of the plurality of lines of the first electrodes.

Independent claim 17 recites, inter alia, first electrodes formed on the substrate as a plurality of parallel evenly spaced lines, and first electrode terminals connected to the respective first electrodes; a second electrode unit comprising: second electrodes formed in an orthogonal direction with respect to the first electrodes over the first electrodes, and second electrode terminals connected to the respective second electrodes; an emission area formed where the first electrodes intersect the second electrodes; an electroluminescent layer disposed between the first electrodes and the second electrodes in the emission area; and an insulating layer formed under the electroluminescent layer; wherein the insulating layer is provided between each of a plurality of lines of the first electrodes and a portion of a top surface of each of the plurality of lines of the first electrodes, and at a space between the second electrode terminals and the first electrode adjacent thereto.

Independent claim 22 recites, a method of manufacturing an electroluminescent display EL device, the method comprising: forming first electrode terminals and second electrode

terminals along edges of a substrate; forming first electrodes having a predetermined pattern, the first electrodes connected to the first electrode terminals; forming an insulating layer covering at least a space between each of a plurality of lines of the first electrodes, an edge portion of a top surface of each of the plurality of lines of the first electrode and a space between the second electrode terminals and the first electrode adjacent thereto; forming an electroluminescent layer on at least each of the first electrodes; and forming second electrodes on the electroluminescent layer orthogonally with respect to the first electrodes, wherein the second electrodes are connected to the second electrode terminals.

Tadokoro et al. discloses an electroluminescent (EL) device having a transparent electrode layer having display electrodes in the form of segments that are selectively activated to represent desired characters, a back electrode, and an emissive layer between the transparent electrode and the back electrode. (Tadokoro et al. paragraph 0001). As illustrated in FIG. 2, the segments of the transparent electrode layer 2 disclosed in Tadokoro et al., consist of the elements of a digital numeric display. The back electrode 6 is a film of Al or Cr as a sheet. (see for example, paragraphs 0005-0007 and 0031-0033).

In contrast, each of the independent claims recites that the first and second electrodes are **orthogonal** with respect to each other. Further, each of the independent claims recites that **an edge portion** of a top surface of each of the plurality of lines of the first electrodes is covered by the insulating layer. Tadokoro et al. does not teach or suggest either of these features.

Accordingly, Applicants respectfully assert that the rejection of claims 1-8, 10-11, 17-20, and 22-23 under 35 U.S.C. § 102(b) should be withdrawn because Tadokoro et al. fails to teach or suggest each feature of amended independent claims 1, 17, and 22.

Furthermore, Applicants respectfully assert that dependent claims 2-8, 10-11, 18-20, and 23 are allowable at least because of their dependence from claims 1, 17, and 23, and the reasons set forth above.

### III. THE REJECTION OF CLAIMS 9, 15, 16, and 24 UNDER 35 U.S.C. §103(A) AS BEING UNPATENTABLE OVER TADOKORO ET AL. (EP 1 022 931) IN VIEW OF OKUYAMA ET AL. (US 6,531,815).

Applicant(s) respectfully traverse this rejection for at least the following reasons.

Okuyama et al. discloses an EL display device forming display pixels with thin film transistors. Nothing in Okuyama et al. teaches or suggests that the first and second electrodes are **orthogonal** with respect to each other as recited in the claims of the present invention. Okuyama et al. also does not teach or suggest that **an edge portion** of a top surface of each of the plurality of lines of the first electrodes is covered by the insulating layer as recited in the claims of the present invention.

Applicants respectfully assert that the rejection of claims 9, 15, 16, and 24 under 35 U.S.C. §103(a) should be withdrawn because neither Tadokoro et al. nor Okuyama et al., whether taken singly or in any proper combination teach or suggest each feature of independent claims 1 and 22 for at least the reasons set forth above in the arguments for patentability.

IV. THE REJECTION OF CLAIMS 12-14, 21, and 25 UNDER 35 U.S.C. §103(A) AS BEING UNPATENTABLE OVER TADOKORO ET AL. (EP 1 022 931).

Applicants respectfully assert that the rejection of claims 12-14, 21, and 25 under 35 U.S.C. §103(a) should be withdrawn because Tadokoro et al. does not teach or suggest each feature of independent claims 1 and 22 for at least the reasons set forth above in the arguments for patentability.

V. CONCLUSION

In accordance with the foregoing, it is respectfully submitted that all outstanding rejections have been overcome and/or rendered moot. And further, that all pending claims patentably distinguish over the prior art. Thus, there being no further outstanding rejections, the application is submitted as being in condition for allowance which action is earnestly solicited.


If the Examiner has any remaining issues to be addressed, it is believed that prosecution can be expedited and possibly concluded by the Examiner contacting the undersigned attorney for a telephone interview to discuss any such remaining issues.

If there are any underpayments or overpayments of fees associated with the filing of this Amendment, please charge and/or credit the same to our Deposit Account No. 503333.

Respectfully submitted,

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